



Winget | Spadafora | Schwartzberg | LLP



NEW YORK:

45 Broadway  
32<sup>nd</sup> Floor  
New York, NY 10006

T 212.221.6900  
F 212.221.6989  
Katz.H@wssllp.com

March 11, 2020

**VIA ECF**

Hon. Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Matter: Samuel H. Black, et al. v. Anthony Dain, et al.  
Docket No.: 16-cv-01238-CBA-ST

Dear Magistrate Judge Tiscione:

Our office represents the Defendant, Ira Salzman (“Defendant” or “Mr. Salzman”), in the above-referenced action. We jointly write on behalf of our client, Mr. Salzman, and the Plaintiffs, to advise the Court that our respective clients are in the process of attempting to enter into a Confidential Settlement Agreement which would, among other things, resolve all of the claims asserted, or which could have been asserted, by the Plaintiffs against Mr. Salzman in the above-referenced action with prejudice, subject to, and contingent upon, the Court’s approval of the settlement, given that two of the Plaintiffs are minors. Plaintiffs’ counsel has advised that he has received all but two signatures necessary for the full execution of said Confidential Settlement Agreement.

In light of the foregoing, the Plaintiffs and Mr. Salzman jointly request that the Court extend the deadline to conduct expert depositions thirty (30) days from March 31, 2020 to April 30, 2020, so that Mr. Salzman and the Plaintiffs can attempt to obtain all necessary signatures for the full execution of the above-referenced Confidential Settlement Agreement and then seek Court approval of the settlement and, in the interim, avoid incurring unnecessary significant costs associated with conducting four (4) expert depositions (Plaintiff has exchanged 2 expert reports and Mr. Salzman has exchanged 2 expert reports). We would also jointly request that the deadline for the parties to begin dispositive motion practice be extended thirty-one (31) days from April 30, 2020 to June 1, 2020.

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We thank Your Honor for your continued attention and consideration of this matter. Should Your Honor require any further information, we stand ready to provide same.

Respectfully submitted,

Halling & Cayo, S.C.

/s/ Michael H. Schaalman  
Michael H. Schaalman  
[mhs@hallincayo.com](mailto:mhs@hallincayo.com)

Winget, Spadafora & Schwartzberg, LLP

/s/ Harris B. Katz  
Harris B. Katz  
Katz.H@wssllp.com

Cc: All Counsel of Record (Via Electronic Filing)  
Anthony Dain, Esq. (Pro Se) (via email)